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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

12 In re
13 YOUSIF H. HALLOUM,
14 Debtor.
15 Tax I.D. # xxx-xx-2986

Case No. 12-21477
Chapter 11

16 COMMUNITY BANKS OF
17 NORTHERN CALIFORNIA, an
operating division of real party in
interest BANK MIDWEST, N.A.
18 Plaintiff,
19 v.
20 YOUSIF H. HALLOUM,
Defendant.

Adversary Proc. No. 12-02184-C

**JOINT STATEMENT RE DISCOVERY
CONFERENCE AND DISCOVERY PLAN**

Date/Time: Jul. 11, 2012 @ 1:30 p.m.
Ctrm 35, Dept. C, 501 I St., Sacramento, CA
Honorable Christopher M. Klein

22 Through their respective counsel, plaintiff Community Banks of Northern California, an
23 operating division of real party in interest Bank Midwest, N.A., and defendant Yousif H.
24 Halloum submit this statement pursuant to the Court's "Order to Confer on Initial Disclosures
25 and Setting Deadlines" (filed April 23, 2012) and in contemplation of the status conference in
26 this adversary proceeding set for July 11, 2012, at 1:30 p.m.:

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1 Preliminary settlement discussions have not suggested any prospect for early consensual
2 resolution. However, there are problems regarding the ability of an individual chapter 11 debtor
3 to fund defense of dischargeability proceedings, and counsel understand that the Court is
4 therefore inclined to defer such litigation until the posture of the bankruptcy case changes (e.g.,
5 by confirmation of a plan, conversion to chapter 7, or dismissal). Accordingly, subject to Court
6 approval, the parties have agreed to suspend all discovery, including the initial disclosures and
7 development of a specific discovery plan, until counsel agree or the Court directs that the
8 proceeding should be actively prosecuted and defended.

⁹ Dated: June 26, 2012

KATZEN & SCHURICHT

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11 By /s/ David I. Katzen
12 David I. Katzen
Attorneys for Plaintiff Bank Midwest, N.A.

13 Dated: June 26, 2012

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By *Hilton A. Ryder*
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